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AMERICAN SPECIALTY TOY RETAILING ASSOCIATION

May 25, 1995

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MAY 31 1995

Federal Communications Commission
Office of the Secretary
1919 M Street, NW
Washington, DC 20554

FCC MAIL ROOM

Reference: MM Docket 93-48

Enclosed is ASTRA's comment letter regarding Children's TV Shows.

If you have any questions, please contact the ASTRA office.

Sincerely,


Janet Koerner
Executive Director

Enclosure

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List A B C D E

American Specialty Toy Retailers Association

900 Midland Building • Des Moines, IA 50309
tel 515 282 3197 • fax 515 282 9117
7416 1st Ave. • Des Moines, IA 50314

Comment to Notice of Proposed Rule Making for the FCC

The American Specialty Toy Retailing Association (ASTRA), representing over 350 retail stores, manufacturer reps and manufacturers, is pleased to respond to the request for comments put forth by the FCC regarding children's television programming rules.

ASTRA is a relatively new association formed in 1992. One of our major focuses is on promoting the value of play as an educational experience for children. Our association is too new to have developed a series of policy positions from which we could draw to provide a detailed response in the matter before you. However, we believe that a large majority, if not all, of our members would agree that children generally watch too much television in America, and the type of programming available to them is generally inappropriate and too violent. The programming available which does benefit the child is not sufficient in length and kind.

We note with interest that under the concept of a "safe harbor" provision calling for three hours per week of core programming, which is under consideration, a child would have a total of 11 to 15 percent of his/her total television watch time (15,000 to 20,000 hours between the ages of 2 and 17) allocated to "educational television".

We agree with the FCC that it is most appropriate to give the consumer (in this case parents and children) more tools to use at the local level in monitoring television stations on their response to the vigorous development and promotion of educational television programming. We believe ASTRA members can play a role in that effort through informing our customers, both parents and children, of this comment process as well as responding at the local level.

We are supportive of the idea to require stations to include the name of and method for contacting the person at the station responsible for collecting comments on the stations' compliance with the CTA. We are also in agreement that it would be helpful if the reports with regard to children's programming available for public inspection, be physically separated from the other files to make the inspection process easier for interested parties to access.

Many of the points for which you've asked for comment we feel we are unable, at this point, to deal with. However, we do note that in paragraph 24 you have tentatively concluded that "stations should be required to identify programs specifically designed to serve to the educational and informational needs of the children at the time they are aired and, to the extent that programs are scheduled, that licensees should provide such identifying information to program guide users." We are intrigued by the use of an identifiable symbol or icon to designate such programming and believe this approach would be appropriate and helpful. However, it will only be useful to the extent that it identifies good, high quality educational programming. As you have stated in a number of instances, broadcasters have used quite liberal interpretations of what is considered to be educational programming.

COMMENT- FCC

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We support the concept that children's television programming meet minimum length requirements. We are supportive of efforts to tighten the definition of what constitutes educational programming. We support efforts to tighten not only qualitative but quantitative expectations of stations with regard to their children's programming requirements. We would also be supportive of tightening regulations so that children's programming be aired during hours when the majority of children watch T. V. and not in the 5:30 to 7:00 AM time slot.

We are pleased that in paragraph 37 you have reached the tentative conclusion that "we therefore propose to require that any program which is claimed to be 'specifically designated' to meet children's needs has education as a significant purpose." As reference the possible provisions of a safe harbor guideline, we do have some concerns that whatever safe harbor amounts were included, broadcasters would use that as the minimum. We also note that the minimum which was being discussed is one-half of the minimum used in Australia, as referenced by commissioner Rachell B. Chong.

In conclusion, we are extremely pleased that the FCC is revisiting the rules implementing the Children's Television Act of 1990. We believe ASTRA can play a significant role in informing parents and children of the new rules you may implement and look forward to working with you in that process.

93-48

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Federal Communications Commission
Office of the Secretary
1919 M St., NW
Washington, DC 20554

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MAY 31 1995

FOC MAIL ROOM

May 30, 1995

Dear Secretary:

I understand you are taking comments on proposed changes to the Children's Television Act.

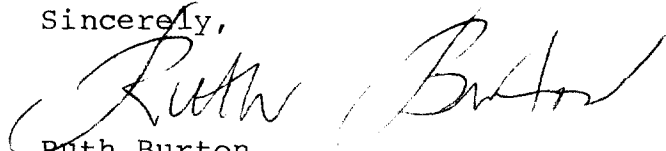
As the mother of two pre-teen daughters, I am often appalled at the content of network "children's programming." In specific, ABC's TGIF Friday evening offerings are frequently filled with sexual situations and innuendo that are very inappropriate for youngsters. (As an adult, I'm not too thrilled by them either.) Restricting sexual content in shows clearly aimed at children is long overdue.

and "adult" language

Please note that I am not a person who advocates limiting freedom of speech. But our children will be better served if not constantly bombarded with adult situations.

(Cheers to many PBS offerings, such as "Carmen Sandiego," "Sesame Street" and "Barney.")

Sincerely,



Ruth Burton
Editor of a weekly newspaper,
wife and mother

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"MM Docket 93-48"

MAY 7, 1995

2 Tolson St
Annapolis, Md 21401
May 25, 1995

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Dear Sirs,

I am responding to an article looking for "likes and dislikes in childrens television".

Let me start by saying that I am about as far away from being a prude as I am from Pluto. But I believe that children get ~~enough~~ ^{to much} bad influences from their everyday surroundings including T.V.

I dislike commercials (natch) and programming that constantly uses name calling and rude/disrespectful behavior. T.V. shows thriving off of rude children ~~don't~~ don't cut mustard with me.

My children watch public television WETA - its terrific. I believe Mr. Rogers gave my son a tremendous prospective on how to treat people, animals & things.

I think we could benefit by having some exercise programs on for children - I think the Green Ranger - what's his name? Bobby? Has a karate exercise vidio out - the kids always enjoy doing it along and he explains when & when not to use what you're learning - perhaps it could be done as an on going show - I want a cut if you use my idea - only kidding! Good luck!
P.S. my telephone # 410-263-7261

Molly Talbott Smith

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